## DS LAW, PLLC

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July 15, 2019

Federal Communications Commission 445 Twelfth Street SW Washington, DC 20554

Re: Ex Parte Presentation, WT Docket No. 16-239

Dear Ms. Dortch:

On March 27, 2019, the ARRL, the National Association for Amateur Radio, formally known as the American Radio Relay League, Incorporated (ARRL), requested a 90-day pause in the above-referenced proceeding. In seeking the delay, it was the ARRL's intent to facilitate discussions between the opposing parties in an effort to explore the possibility of an agreed resolution that would better protect users of the Amateur Radio spectrum from interference and would permit all members of the Amateur Radio service to continue to contribute to the advancement of the radio art. The end purpose, if a binding agreement between the opposing parties could not be reached, was to provide the strongest possible basis for the ARRL to file its recommendations on a fair and equitable resolution of the issues.

On June 11, 2019, the ARRL submitted an Interim Report on its efforts to bring both sides together.

Despite difficulties, partially attributable to the passions of the respective parties, the ARRL was successful in scheduling meetings with both sides and eventually joint discussions between the respective parties. On June 28, in a continuing effort to obtain a consensus and compromise, the ARRL requested an additional 60-day pause to pursue promising talks. This letter constitutes the final report on our efforts.

When this process began, we expressed our intention to reach a common understanding of issues and to agree on their resolution insofar as possible. At the beginning of our meetings there emerged consensus on the issues to be discussed. By the end, the parties had reached consensus on some of the issues, but not all. Despite our best efforts, some of the parties did not agree to submit to the Commission any of the recommendations on which there had been an apparent consensus, having negotiated with an "all or nothing" approach.

Despite this disappointing conclusion, I am confident that there is a better understanding of issues and positions of the various interests by all of the parties who participated in the inperson meetings and teleconference calls, and that this will have an overall positive effect upon the outcome of the proceedings before you. I especially want to acknowledge with appreciation the time and work devoted by the individuals who participated in the calls and meetings: Ari Fitzgerald and John Castle, representing New York University/Ted Rappaport, N9NB; Loring Kutchins, W3QA; Ron Kolarik, K0IDT; Tom Lafleur, KA6IQA; Janis Carson, AB2RA; Ross Merlin, WA2WDT; Dan White, W5DNT and Mike Marcus, N3JMM. While these are the persons who spent many hours in the discussions and debates both with me and among themselves, I know that there were others who worked behind the scenes without whose help the information and discussion would not have been possible.

The ARRL remains committed to providing the Commission with its best recommendations on a fair and equitable resolution of the issues after it has had an opportunity for discussion and deliberation.

We express our appreciation to the Commission staff for granting the time to attempt resolution of these issues within the ham community.

The ARRL membership is composed of radio amateurs with a broad array of interests in technical and experimental domains that range from creating and using satellite technologies to long-haul emergency message handling. The ARRL is committed to promoting and protecting the interests of *all* Amateur Radio operators as it continues to address amateur interests and concerns.

Respectfully submitted,

David R. Siddall

ARRL Washington Counsel

DR Sistall

cc: Scot Stone, WTB Roger Noel, WTB Docket RM-11831